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July 18, 2018

FILED VIA CM/ECF

Hon. Peter C. McKittrick
U.S. Bankruptcy Court – District of Oregon
1001 SW 5th Ave., Suite 700
Portland, OR 97204

Re: *In re: Szanto v. Szanto, et al.*
Adversary Proc. No. 16-3114-pcm
Notice of Unavailability

Dear Judge McKittrick:

At the recent status conference, you instructed the parties to provide notice of dates on which they will be unavailable for a trial setting between the dates of October 1 and December 15, 2018. I have had the chance to check my calendar for existing commitments during that timeframe, and I've also checked in with my clients about their unavailability. Based on that review, it appears that my clients and I would be available for a three-day trial any time during the window of November 26th to December 15th. Additionally, my clients and I would be available from December 17th to December 21st.

I recognize that I am providing you with notice that my clients and I are unavailable during a very large portion of the dates you proposed. I apologize for that, and I assure you that my clients and I are not trying to be difficult. I have multiple trials and hearings scheduled in September and October, all of which would make pre-trial submissions extremely difficult, and attendance at a trial impossible. Additionally, several of my clients have different travel plans during the month of October and early November, and I myself have travel plans during the week of Thanksgiving—the week of November 19th.

If a trial of three consecutive days can be scheduled sometime during the window of November 26th to December 21st, that would be ideal. Otherwise, if the Court cannot schedule trial during the requested time period, I request additional time to confer with my clients about dates that would work if the trial days were not consecutive. Because non-consecutive trial days would be more complicated to plan, especially given the fact that I have numerous clients who will be required to travel from out of state, I need additional time to coordinate. Additional time would be needed to plan around my trial and hearing commitments as well.

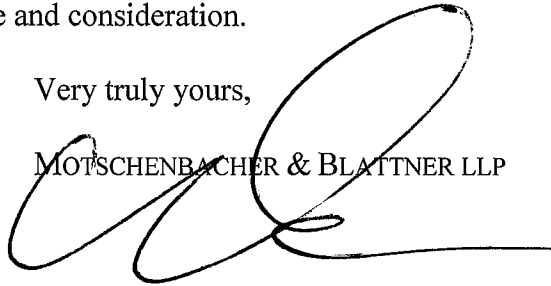
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As always, thank you for your time and consideration.

Very truly yours,

MOTSCHENBACHER & BLATTNER LLP

A handwritten signature in black ink, appearing to be 'N. Henderson', written over the printed name and firm name.

Nicholas J. Henderson

cc: Peter Szanto (via first-class mail)
11 Shore Pine
Newport Beach, CA 92657